



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

November 7, 2022

By ECF

The Honorable Andrew E. Krause
United States Magistrate Judge
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *Martinez Trujillo et al. v. United States*, No. 20 Civ. 7821 (AEK)

Dear Judge Krause:

I write on behalf of all parties in the above-captioned case. Pursuant to the Court's instructions at the November 3, 2022 status conference, the parties have conferred with each other and their experts regarding possible trial dates.

Due to limitations on experts' availability, the parties do not believe that it is feasible to hold the trial between November 16 or 17 and November 23, 2022.

Mindful that the Court's January trial calendar is already quite full, the parties would be available for trial between January 17 and January 24, 2023. If the Court is able to accommodate this trial date, the parties would propose the following schedule:

January 17: Openings; Ms. Coster; Ms. Solomon
January 18: Continuation of Solomon as needed; Ms. Aaberg; Plaintiffs as available
January 19: Plaintiffs as available; Dr. Michalewski
January 20: Continuation of Plaintiffs and/or Dr. Michalewski as needed (possibly no trial testimony)
January 23
 Morning: Dr. Berdichevsky if needed (possibly no trial testimony)
 Afternoon: Dr. Ky
January 24: Dr. Eddleman; closings

We thank the Court for its consideration of the parties' request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Lucas Issacharoff
Lucas Issacharoff
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2737
Email: Lucas.Issacharoff@usdoj.gov